

Hardesty, Doug

From: Nair, Pat <Nair.Pat@epa.gov>
Sent: Monday, September 30, 2013 9:44 AM
To: Baumgartner, James R (DEC)
Cc: Plosay, James R (DEC); Hardesty, Doug
Subject: RE: EPA PSD permit BACT limits for Sohio (now BP) Prudhoe Bay

Jim:

BACT applies at all times unless the BACT determination provides otherwise. If a BACT determination was made for full-load operations, there should also be BACT conditions for operations at other than full load.

In the absence of conditions addressing operations other than full-load, the BACT limits cannot be interpreted to only apply to full-load operations. The original BACT determinations and information submitted by the applicant will be instructive here.

Pat Nair
Office of Air, Waste and Toxics
Idaho Operations Office
950 W. Bannock Street, Suite 900
Boise, Idaho 83702
Ph. 208-378-5754
Fax 208-378-5744

From: Baumgartner, James R (DEC) [mailto:jim.baumgartner@alaska.gov]
Sent: Friday, September 27, 2013 6:38 PM
To: Hardesty, Doug
Cc: Nair, Pat; Baumgartner, James R (DEC); Plosay, James R (DEC)
Subject: EPA PSD permit BACT limits for Sohio (now BP) Prudhoe Bay

Doug,

BP has recently raised concerns w/ our director regarding TV coordination and generally applicable requirements. I'd like to discuss their concerns with you and/or Pat next week. Please let me know of a convenient time/date to discuss this w/ you.

Short Issue Statement:

Do federal BACT limits apply only at full load?

General Background:

EPA permitted Prudhoe Bay through four permitting actions in the late 70s and early 80s. In addition, EPA has made changes to those decisions in 1997.

EPA imposed BACT limits for NO_x, CO, and other pollutants dependent on the project. At other than full load, CO emissions are expected to be greater than that of full-load characteristics.

During our initial round of Operating Permits, ADEC added a footnote stating that these BACT limits apply only at full load. However, the federal decisions and amendments do not include such language.

We are completing renewal permits, and these Prudhoe Bay permits are remaining in our queue. We reconsidered our 2002/2003 decision and have decided to remove these footnotes from our renewal permit, explaining that the footnote is inconsistent w/ federal permitting decisions. Neither the Technical Reports nor EPA X PSD permits specifically restrict limits to apply only at full load. To us it would make little sense to impose an emission limit representative of BACT at only full load.

As we've discussed before, the EPA Prudhoe Bay BACT limits generally used AP-42 at the time of the permitting decision for NOx & CO. The amendments updated these limits w/ current AP-42 emission factors as BACT. We also impose gap-filling monitoring (testing) to prove whether they comply as part of the renewal permits, which may constitute part of the "rub."

Attached is a copy of the federal permit amendment from the 1997 amendment with the BACT limits

.

James R. Baumgartner,
Compliance Section Manager,
Air Permits Program
Ph. 907-465-5108 Fax 907-465-5129